

FILED

SEP 30 2020

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY DEPUTY**SEALED**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**SA20CR0454 OLG**
INDICTMENT

UNITED STATES OF AMERICA,

Plaintiff,

v.

DONALD TREVINO (1),
A/K/A "FLUFFY", "D", "UNO", "GORDO";
RODOLFO VILLALOBOS (2),
A/K/A "FLUFFY", "CHUBS", "ORO";
DAVID BOTELLO (3),
A/K/A "TORITO", "BULLY", "BULLY-
MAN";
JOSEPH LLOYD VONALLMAN (4),
A/K/A "JOSEPH VONALLMEN", "JV";
DAVID CORTEZ JR. (5),
A/K/A "TAZMANIAN", "TAZ";
MOSES CHAVEZ (6),
A/K/A "MOE", "MIGHTY MOUSE";
NICHOLAS NEAVES (7),
A/K/A "SNOOPSTER", "SNOOP";
RICHARD AGUEROS III (8),
A/K/A "HERC";
ROBERT ARZOLA JR. (9);
LUZ DEL CARMEN VELARDE-CAMPOS
(10),
A/K/A "PRIMA";
AARON MUNIZ (11),
A/K/A "PRIMO";
ISABEL HERNANDEZ-GARCIA (12);

Defendants.

COUNT I: 21 U.S.C. §846, 841(a)(1),
841(b)(1)(A) – Conspiracy to Possess with
Intent to Distribute More Than 500
Grams of a Mixture or Substance
Containing Methamphetamine

COUNT II: 21 U.S.C. §841(a)(1),
841(b)(1)(B) – Possession with Intent to
Distribute More Than 50 Grams of a
Mixture or Substance Containing
Methamphetamine

COUNT III: 21 U.S.C. §841(a)(1),
841(b)(1)(B) – Possession with Intent to
Distribute More Than 100 Grams of a
Mixture or Substance Containing Heroin

COUNT IV: 21 U.S.C. §841(a)(1),
841(b)(1)(B) – Possession with Intent to
Distribute More Than 50 Grams of a
Mixture or Substance Containing
Methamphetamine

COUNT V: 21 U.S.C. §841(a)(1),
841(b)(1)(A) – Possession with Intent to
Distribute More Than 500 Grams of a
Mixture or Substance Containing
Methamphetamine

COUNT VI: 21 U.S.C. §841(a)(1),
841(b)(1)(B) – Possession with Intent to
Distribute More Than 100 Grams of a
Mixture or Substance Containing Heroin

COUNT VII: 18 U.S.C. §922(g)(1) – Felon
in Possession of a Firearm

COUNT VIII: 21 U.S.C. §841(a)(1),
841(b)(1)(C) – Possession with Intent to
Distribute Cocaine

THE GRAND JURY CHARGES:

COUNT ONE

[21 U.S.C. §§ 846, 841(a)(1) and 841(b)(1)(A)]

That beginning in or around July 2020, the precise date unknown, and continuing to on or about September 23, 2020, in the Western District of Texas, Defendants

**DONALD TREVINO (1);
RODOLFO VILLALOBOS (2);
DAVID BOTELLO (3);
DAVID CORTEZ JR. (5);
MOSES CHAVEZ (6);
NICHOLAS NEAVES (7);
RICHARD AGUEROS III (8);
ROBERT ARZOLA JR. (9);
LUZ DEL CARMEN VELARDE-CAMPOS (10); and
AARON MUNIZ (11)**

did knowingly and intentionally combine, conspire, confederate and agree together and with each other, and with other persons known and unknown to the Grand Jury, to distribute and possess with intent to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, its salts, isomers, and salts of its isomers, in violation of Title 21, United States Code, Sections 846, 841(a)(1) and 841(b)(1)(A).

PENALTY ENHANCEMENT

Before **DONALD TREVINO (1)** committed the offense charged in this count, **DONALD TREVINO (1)** had a final conviction for a serious violent felony, namely, Aggravated Robbery under Texas Penal Code Section 29.03, for which he served more than 12 months of imprisonment.

Before **DONALD TREVINO (1)** committed the offense charged in this count, **DONALD TREVINO (1)** had a final conviction for a serious drug felony, namely, Conspiracy to Distribute a Controlled Substance, Which Offense Involved 100 Grams or More of a Mixture or Substance Containing a Detectable Amount of Heroin, and 50 Grams or More of a Mixture or Substance Containing a Detectable Amount of Methamphetamine, under Title 21, United States Code,

Section 846, for which he served more than 12 months of imprisonment and for which he was released from serving any term of imprisonment related to that offense within 15 years of the commencement of the instant offense.

Before **RODOLFO VILLALOBOS (2)** committed the offense charged in this count, **RODOLFO VILLALOBOS (2)** had a final conviction for a serious violent felony, namely Aggravated Assault with a Deadly Weapon (Repeater) under Texas Penal Code Section 22.02(a)(2), for which he served more than 12 months of imprisonment.

Before **DAVID BOTELLO (3)** committed the offense charged in this count, **DAVID BOTELLO (3)** had a final conviction for a serious violent felony, namely Murder, for which he served more than 12 months of imprisonment.

COUNT TWO
[21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)]

That on or about July 28, 2020, in the Western District of Texas, Defendant

DAVID BOTELLO (3)

did knowingly, intentionally and unlawfully possess with intent to distribute 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, its salts, isomers, and salts of its isomers, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

PENALTY ENHANCEMENT

Before **DAVID BOTELLO (3)** committed the offense charged in this count, **DAVID BOTELLO (3)** had a final conviction for a serious violent felony, namely Murder, for which he served more than 12 months of imprisonment.

COUNT THREE

[21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)]

That on or about July 30, 2020, in the Western District of Texas, Defendant

MOSES CHAVEZ (6)

did knowingly, intentionally and unlawfully possess with intent to distribute 100 grams or more of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT FOUR

[21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)]

That on or about August 6, 2020, in the Western District of Texas, Defendants

**RODOLFO VILLALOBOS (2) and
ISABEL HERNANDEZ-GARCIA (12)**

did knowingly, intentionally and unlawfully possess with intent to distribute 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, its salts, isomers, and salts of its isomers, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

PENALTY ENHANCEMENT

Before **RODOLFO VILLALOBOS (2)** committed the offense charged in this count, **RODOLFO VILLALOBOS (2)** had a final conviction for a serious violent felony, namely Aggravated Assault with a Deadly Weapon (Repeater) under Texas Penal Code Section 22.02(a)(2), for which he served more than 12 months of imprisonment.

COUNT FIVE

[21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A)]

That on or about August 24, 2020, in the Western District of Texas, Defendant

LUZ DEL CARMEN VELARDE-CAMPOS (10)

did knowingly, intentionally and unlawfully possess with intent to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, its salts, isomers, and salts of its isomers, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

COUNT SIX

[21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)]

That on or about August 26, 2020, in the Western District of Texas, Defendant

DONALD TREVINO (1)

did knowingly, intentionally and unlawfully possess with intent to distribute 100 grams or more of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

PENALTY ENHANCEMENT

Before **DONALD TREVINO (1)** committed the offense charged in this count, **DONALD TREVINO (1)** had a final conviction for a serious drug felony, namely, Conspiracy to Distribute a Controlled Substance, Which Offense Involved 100 Grams or More of a Mixture or Substance Containing a Detectable Amount of Heroin, and 50 Grams or More of a Mixture or Substance Containing a Detectable Amount of Methamphetamine, under Title 21, United States Code, Section 846, for which he served more than 12 months of imprisonment and for which he was released from serving any term of imprisonment related to that offense within 15 years of the commencement of the instant offense.

COUNT SEVEN
[18 U.S.C. § 922(g)(1)]

That on or about September 18, 2020, in the Western District of Texas, Defendant

JOSEPH LLOYD VONALLMAN (4),

knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm, to wit: a Smith & Wesson, model SW40VE, semi-automatic pistol, .40 S&W in caliber; and said firearm had been shipped and transported in interstate and foreign commerce in violation of Title 18, United States Code, Section 922(g)(1).

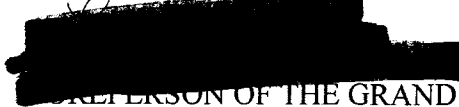
COUNT EIGHT
[21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C)]

That on or about September 18, 2020, in the Western District of Texas, Defendant

JOSEPH LLOYD VONALLMAN (4),

did knowingly, intentionally and unlawfully possess with intent to distribute a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, its salts, isomers, and salts of its isomers, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

A TRUE BILL



MEMBER OF THE GRAND JURY

JOHN F. BASH
UNITED STATES ATTORNEY

BY:



ERIC YUEN
Assistant United States Attorney